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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

2000 Biennial Regulatory Review)

Comprehensive Review of the Accounting)

Requirements and ARMIS Reporting)

Requirements for Incumbent Local Exchange)

Carriers: Phase 2 and Phase 3)

CC Docket No. 00-199

WORLDCOM COMMENTS

WorldCom hereby submits its comments in response to the Commission's June 8, 2001 Public Notice in the above-captioned proceeding. In the Public Notice, the Commission sets forth a proposal to revise both the Class A and Class B account structures.

In general, the proposed charts of accounts would strike a reasonable balance between streamlining the account structure and updating the account structure to reflect changes in technology and the adoption of the Telecommunications Act of 1996. In the case of the Class A chart of accounts, for example, the Commission would reduce the number of accounts by over 40 percent, despite adding new accounts for interconnection expenses and revenues.

One aspect of the Commission's proposal requires clarification. According to the Public Notice, the Commission proposes to eliminate Account 5084, state access revenue. Apparently, the ILECs would now record both intrastate and interstate access revenues in accounts 5080 to 5083. This would be a reasonable approach, assuming that the

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Commission modifies Section 36.213 of the separations rules, which is based on the current system of separate interstate and intrastate access revenue accounts,¹ and modifies the ARMIS 43-04 report to require separate reporting of the interstate and intrastate revenues in Accounts 5080-5083.

In three respects, the Commission should add additional detail to the account structure. First, the Commission should create separate accounts for UNE revenue, interconnection revenue, resale revenue, and other interconnection revenue, rather than consolidating all of these revenue sources into a single account (similarly, the Commission create four separate accounts for interconnection expenses). The Commission has already tentatively concluded that the creation of separate accounts for each type of interconnection revenue and expense would provide the Commission with useful information without imposing undue burdens on the ILECs,² and the Public Notice offers no explanation for the change in course. Separate accounts would “enable the Commission to monitor and assess the economic impact of the development of local exchange and exchange access competition”³ for each of the three market entry paths contemplated by the 1996 Act.⁴ If the Commission does not create separate accounts, it should, at a minimum, require the revenues or expenses in each subaccount to be reported in ARMIS. Such reporting would

¹47 C.F.R. § 36.213(a)-(e).

²Amendment to Uniform System of Accounts for Interconnection, Notice of Proposed Rulemaking, 12 FCC Rcd 16577, ¶ 6.

³Id., ¶ 6.

⁴Id., ¶ 5.

provide the Commission with an essential tool for monitoring each of the three local market entry paths.

The Public Notice proposal should be modified in other respects as well. First, rather than consolidate the eight current local revenue accounts into a single account, the Commission should maintain at least three accounts -- one of basic local exchange revenue, one for local private line revenue, and one for other local exchange revenue. As WorldCom, GSA, and other commenters explained, the consolidation of “distinctly different sources of [local] revenue [into a single account] would hinder effective analysis and provide little if any lessened regulatory burden.”⁵

Second, the Commission should not eliminate essential Class A-level detail for customer operations expense and corporate operations expense. As WorldCom explained in its comments, the Commission and other parties have employed Class A account-level analysis of the expenses recorded in these accounts when estimating universal service costs or estimating the forward-looking cost of unbundled network elements. In addition, because many of these accounts record expenses of the type that are avoided when services

⁵GSA Comments at 4.

are provided at wholesale, Class A-level analysis of these accounts plays an important role in determining the Section 252(d)(3) resale discount.⁶

Respectfully submitted,
WORLDCOM, INC.



Alan Buzacott
1133 19th Street., NW
Washington, DC 20006
(202) 887-3204

July 16, 2001

⁶See Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, First Report and Order, CC Docket No. 96-98, released August 8, 1996, at ¶¶ 890-934.

STATEMENT OF VERIFICATION

I have read the foregoing, and to the best of my knowledge, information, and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on July 16, 2001.



Alan Buzacott
Senior Manager, Regulatory Affairs
1133 19th Street, N.W.
Washington, D.C. 20036
(202) 887-3204

CERTIFICATE OF SERVICE

I, Barbara Nowlin, do hereby certify that copies of the foregoing Comments were sent via first class mail, postage paid, to the following on this 16th Day of July, 2001.

International Transcription Services
1231 20th Street, N.W.,
Washington, DC 20036

Susan Stevens Miller
General Counsel
Maryland Public Service Commission
6 Saint Paul Street
Baltimore, MD 21202

David W. Zesiger
Executive Director
ITTA
1300 Connecticut Avenue
Suite 600
Washington, DC 20036

Karen Brinkman
Richard R. Cameron
Benoit Jacqmotte
Latham & Watkins
1001 Pennsylvania Avenue, NW
Suite 1300
Washington, DC 20004

Christopher J. Wilson
Delia Reid Saba
Cincinnati Bell
201 East Fourth Street
Cincinnati, OH 45202

Margot Smiley Humphrey
Holland & Knight
2100 Pennsylvania Avenue, NW
Suite 400
Washington, DC 200037

Paul J. Feldman
Fletcher Heald & Hildreth
1300 North 17th Street
11th Floor
Arlington, VA 22209

Jay C. Keithley
Sprint
401 9th Street, #400
Washington, DC 20004

James U. Troup
Brian D. Robinson
Arter & Hadden
1801 K Street, NW, Suite 400K
Washington, DC 20006-1301

Marilyn Showalter
Richard Hemstad
William R. Gillis
WUTC
1300 S. Evergreen Park Dr., SW
P.O. Box 47250
Olympia, WA 98504-7250

James T. Hannon
Qwest
Suite 700
1020 19th Street, NW
Washington, DC 200036

Stephen L. Earnest
Richard M. Sbaratta
BellSouth
675 West Peachtree Street
Atlanta, GA 30375

Mark C. Rosenblum
Judy Sello
AT&T
Room 1135L2
295 North Maple Avenue
Basking Ridge, NJ 07920

Carolyn C. Hill
ALLTEL
601 Pennsylvania Avenue, NW
Suite 720
Washington, DC 20004

Frank E. Landis, Chairman
Nebraska PSC
300 The Atrium
1200 N Street
Lincoln, NE 68506

Scott Fabel
Rate Analyst
Montana Public Service Commission
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

Vickie L. Moir
Staff Attorney, NCUC
4326 Mail Service Center
430 North Salisbury Street
Raleigh, NC 27699-4326

Robert S. Tongren
Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485

Michael J. Travieso
NASUCA
8300 Colesville Road, Suite 101
Silver Spring, MD 20910

Lawrence G. Malone
General Counsel
New York PSC
Three Empire State Plaza
Albany, NY 12223-1350

James Bradford Ramsay
Sharla M. Barkland
NARUC
1101 Vermont Ave, Suite 200
Washington, DC 20005

Cynthia B. Miller
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

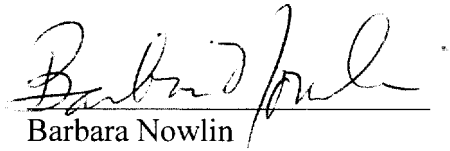
Lawrence E. Sarjeant
Linda L. Kent
Keith Townsend
John W. Hunter
Julie E. Rones
USTA
1401 H Street, NW, Suite 600
Washington, DC 20005

Lisa D. Nordstrom
Idaho PUC
PO Box 38720
Boise, ID 83720-0074

George N. Barclay
Michael J. Ettner
GSA
1800 F Street NW, Room 40002
Washington, DC 20405

Joe DiBella
Verizon
1320 North Courthouse Road
Eighth Floor
Arlington, VA 22201

****HAND DELIVERED**


Barbara Nowlin